

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHER DISTRICT OF TEXAS
HOUSTON DIVISION**

**SANDRA DEL-WISE and
RALPH J. MILLER**
*on behalf of themselves, and all others
similarly situated*
Plaintiff,

VS.

**TAXMASTERS, INC.
TMIRS ENTERPRISES, LTD,
TM GP SERVICES, LLC
and PATRICK R. COX
Defendants.**

CIVIL ACTION NO. 4:10-cv-03330

**SUPPLEMENT TO MOTIONS TO QUASH DEPOSITION SUBPOENA AND/OR MOTION FOR
PROTECTION FROM DEPOSITION, WITH ATTACHED DECLARATION OF COUNSEL**

Comes now, The Spencer Law Firm, Mark Wham and Gregory Finney and file this their Supplement to Motions to Quash Deposition Subpoena and/or Motion For Protection from Deposition, with Attached Declaration of Counsel, and show as follows:

As the Magistrate is aware, Defendants propounded discovery requesting detailed, private information regarding Counsel's finances, and also noticed the depositions of Plaintiffs' Counsel. Defendants' proposed inquiries into Counsel's finances via depositions, subpoenas, and requests for production would be inappropriate. In response, Plaintiffs' Counsel presents to the Magistrate the attached Declaration of Counsel to inform the Magistrate that The Spencer Law Firm is adequately prepared to prosecute and finance this litigation. This Declaration is sufficient to address The Spencer Law Firm's ability and willingness to prosecute this suit.

Respectfully submitted,

THE SPENCER LAW FIRM



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CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the above and foregoing document(s) was served upon the following parties via the United States District Court's electronic transmission services on March 11, 2011

Matthew B. Probus
John Wesley Wauson
Wauson ♦ Probus
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Mark Wham